



# **Federal Railroad Administration**

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**Remarks for PTC Working Group**

**Philadelphia**

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# Objectives

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- Rule status generally
- Efforts toward “Adjusted Base Case”
- Other Risk2 issues
- Progress on risk assessment
- Implications for going forward
- Further actions on the rule
- Cost/benefit study

# Disclaimer

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Opinions expressed are mine

As always, they are expressed here  
to inform

**and to elicit corrective responses**

# Rule Status

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- **FRA preparing to move forward**
- **DOT policy to move overdue rules**
- **Suppliers, railroads deserve to know what the rules will be**
- **Members of this working group support early action**
- **Will complete FRA action on final rule by Labor Day**

# Base Case Efforts

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- **Adjusted base case is the major unresolved issue**
- **Trigger**
  - Apparent agreement that speed should be a trigger
  - No agreement regarding density or other factors as a trigger
- **Some lack of confidence with respect to degree of difference made by major methods of operation—but minds are open**

# Base Case Efforts

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- **None of us have complete confidence on how to proceed**
- **Data may help provide that confidence**
- **Initial focus on freight data**
- **Volpe Report – Bob Dorer**

# Other Risk2 Issues

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- **“Representative case” issue**
  - Subset or model set of the railroad in order to qualify systems for wide deployment?
  - Concerns include intent of NPRM and means of establishing
- **Team will work with Volpe on development of database**
- **Consider implications of recent ART work?**

# Other Developments

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- **ASCAP progress**
- **Continued work expected**
- **Human factors remain big issue**
- **Increased use of COTS hardware / software presents larger zone of uncertainty**
- **Cost of safety analysis is growing**



# Other Developments

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- **Standards for interoperability have not emerged**
- **Technologies continue to proliferate indicating more diversity than commonality**
- **Existing projects have presented greater challenges than initially anticipated**
- **FRA is on the receiving end**
- **FRA resources may not grow in the future**

# Implications

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- Assume “adjusted base case” is successfully resolved
- Final rule needs to be flexible, encourage use of failsafe (Subpart A-G compliant) technology where appropriate in context
- Option--traditional approach with good safety documentation and configuration management?
- Continued ability to qualify innovative systems using rigorous risk assessment

# Implications

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- **FRA needs to see results of IDOT, other efforts before venturing to a pure performance-based approach to high speed rail**
  - Where frequency of residual events is lowest, uncertainty is a bigger problem
  - FRA should be able to accept credible risk assessment, but should not be boxed where the case is close
  - Benefit/cost considerations should be on the table

# Implications

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- But if we can mature these processes  
Part 235 should be re-examined

# Further Actions on the Rule

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- Provide data / analysis to Risk2 (Volpe 4/03)
- Complete Risk2 recommendation on base case (Risk2 group 5/03)
- PTC Working Group review and act (6/03)
- RSAC review and act (7/03)

# Further Actions on the Rule

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- Other actions by this Working Group?

# Cost/Benefit Mandate

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- **Initiated by Senate Approp. Comm.**
- **Conferees adopted**
- **Scope: costs/benefits of PTC “and related systems”**
- **Take into consideration—**
  - Advances in technology
  - Savings to carriers and shippers
  - Priority to mix of passengers and freight
- **Letter report by 10/1/2003**

# Cost/Benefit Mandate

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- **Safety impetus**
- **Impression that costs may have fallen**
- **Concern that investments in technology may not be forward-compatible**
- **Deadline and report format indicate desire for quick turn-around**



# Cost/Benefit Plan

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- **Contract study on costs and business benefits**
  - Informal consultation with members
- **ART team help to describe architectures with current relevance / resort yeses and maybes at 2 levels**
- **FRA to integrate cost and benefit information**

# Cost/Benefit Plan

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- PTC Working Group review draft letter report
- Make changes as appropriate
- If changes not agreed upon, succinctly reflect views of parties
- Recommendations to full committee

# Thanks

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- Thank you for your contributions to this process.
- Let's keep it going.